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2 Including Professional Corporations  
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COURTYARD MANAGEMENT  
8 CORPORATION (*now known as*  
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9 MARRIOTT INTERNATIONAL, INC.

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AMANDA BALDINO-MILLER  
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16 UNITED STATES DISTRICT COURT  
17 EASTERN DISTRICT OF CALIFORNIA  
18

19 AMANDA BALDINO-MILLER, on  
behalf of herself and all similarly  
aggrieved employees,

20 Plaintiff,

21 v.

22 COURTYARD MANAGEMENT  
23 CORPORATION; MARRIOTT  
INTERNATIONAL, INC.; and DOES 1  
24 through 50, inclusive,

25 Defendants.  
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Case No. 1:23-CV-01613-BAM

Fresno County Superior Court Case No.  
23CECG04219

State Court Complaint Filed: October 9,  
2023

**JOINT STIPULATION FOR LEAVE  
TO FILE FIRST AMENDED  
COMPLAINT; [PROPOSED]  
ORDER GRANTING SAME**

U.S Magistrate Judge: Barbara A.  
McAuliffe  
Courtroom 8 (Sixth Floor)

1  
2 TO THIS HONORABLE COURT, ALL PARTIES AND THEIR COUNSEL  
3 OF RECORD:

4 Plaintiff AMANDA BALDINO-MILLER (“Plaintiff”) and Defendants  
5 COURTYARD MANAGEMENT CORPORATION (*now known as* COURTYARD  
6 MANAGEMENT, LLC) and MARRIOTT INTERNATIONAL, INC. (together  
7 “Defendants”) (collectively Plaintiff and Defendants are referred to herein as the  
8 “Parties”), through their respective counsel of record, stipulate as follows:

9 1. WHEREAS, on October 9, 2023, Plaintiff filed this purported class and  
10 representative action under the Labor Code Private Attorneys General Act of 2004  
11 (“PAGA”) against Defendants;

12 2. WHEREAS, on November 15, 2023, Defendants removed this action to  
13 the United States District Court for the Eastern District of California;

14 3. WHEREAS Plaintiff now desires to file the First Amended Complaint  
15 attached as **Exhibit A** to this Joint Stipulation, which, among other things, amends  
16 the original Complaint to remove non-exempt employees from the putative class and  
17 PAGA action entirely;

18 4. WHEREAS, upon review of the proposed First Amended Complaint  
19 attached as Exhibit A, Defendants do not oppose the filing of the First Amended  
20 Complaint;

21 5. WHEREAS, the Parties agree that notwithstanding Defendants’  
22 agreement to the filing of the First Amended Complaint, Defendants are not waiving  
23 any arguments related to, nor agreeing to, the proposed scope of the putative class  
24 and PAGA groups, the certifiability of the putative class, or the scope of discovery  
25 associated with the putative class and PAGA groups;

26 6. WHEREAS, the Parties agree that, notwithstanding Defendants’  
27 agreement to the filing of the First Amended Complaint, Defendants are not  
28 admitting to the merits of the articulated claims therein and reserve all rights to

1 challenge them to the fullest extent permissible under relevant California and  
2 Federal authority in any responsive pleading or other motion; and

3 7. WHEREAS, the Parties agree Defendants may have thirty (30) days to  
4 respond to the First Amended Complaint from the date the First Amended  
5 Complaint is deemed filed.

6 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** as  
7 follows:

8 1. The proposed First Amended Complaint attached as **Exhibit A** to this  
9 Joint Stipulation, which, among other things, amends the original Complaint to  
10 remove non-exempt employees from the putative class and PAGA action entirely,  
11 may be filed by Plaintiff;

12 2. The Parties agree that notwithstanding Defendants' agreement to the  
13 filing of the First Amended Complaint, Defendants are not waiving any arguments  
14 related to, nor agreeing to, the proposed scope of the putative class and PAGA  
15 groups, the certifiability of the putative class, or the scope of discovery associated  
16 with the putative class and PAGA groups;

17 3. The Parties agree that, notwithstanding Defendants' agreement to the  
18 filing of the First Amended Complaint, Defendants are not admitting to the merits of  
19 the articulated claims therein and reserve all rights to challenge them to the fullest  
20 extent permissible under relevant California and Federal authority in any responsive  
21 pleading or other motion; and

22 4. The Parties agree Defendants may have thirty (30) days to respond to  
23 the First Amended Complaint from the date the First Amended Complaint is deemed  
24 filed.

25 **IT IS SO STIPULATED.**  
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1 Dated: November 18, 2025 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

2  
3 By Kristi L. Thomas /s/  
4 GREG LABATE  
5 KRISTI L. THOMAS  
6 Attorneys for Defendants  
7 COURTYARD MANAGEMENT  
8 CORPORATION (now known as  
9 COURTYARD MANAGEMENT, LLC); and  
MARRIOTT INTERNATIONAL, INC.

10 Dated: November 17, 2025 STAMBELOS LAW OFFICE

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13 By Patricia T. Stambelos /s/  
14 PATRICIA T. STAMBELOS  
15 Attorney for Plaintiff  
16 AMANDA BALDINO-MILLER  
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**ORDER**

Based upon the Joint Stipulation of the Parties and other good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the above Joint Stipulation is entered.

IT IS FURTHER ORDERED that:

1. Within five (5) days of the date of this order, Plaintiff shall file the proposed First Amended Complaint attached as Exhibit A to the Joint Stipulation.
2. Defendants shall respond to the First Amended Complaint within thirty (30) days from the date the First Amended Complaint is filed.

IT IS SO ORDERED.

Dated: November 18, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE